

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)

)

v.)

)

ROBERT A. RAMOS,)

)

1:04CR10146-WGY-001

**UNITED STATES' MOTION TO DECLARE FORFEITURE
OF MONEY SEIZED FROM DEFENDANT**

Pursuant to 18 U.S.C. § 3572(d)(1) and 42 U.S.C. § 1651, the United States of America requests this court to forfeit the money the Federal Bureau of Investigation seized from the defendant, Robert A. Ramos (hereinafter "Ramos"), in the amount of \$2,000.00

In support, the United States says:

1. In December 2003, Ramos made a \$2,000.00 partial payment to the hired hitman for the intended murder-for-hire of his son's mother.
2. The FBI now holds this money in a special account.
3. On December 9, 2003, a criminal complaint was filed in the United States District Court for the District of Massachusetts against Ramos. Ramos was arrested the following day. He was charged with Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire; Aiding and Abetting; and Interstate Travel in Commission of Murder-for-Hire.
4. On January 11, 2005, Ramos entered a plea of guilty to Counts 1 through 3.
5. On July 26, 2005, Ramos appeared in the United States District Court before Chief Judge William G. Young for a downward departure. The court sentenced the defendant to pay a \$300.00 Special Assessment.

6. Now the United States seeks to have \$300.00 of the funds held by the Federal Bureau of Investigations applied to pay for the Court imposed Special Assessment.¹

WHEREFORE, the United States of America requests this Court to forfeit \$300.00 of the monies held by the Federal Bureau of Investigation for Ramos, pursuant to 18 U.S.C. § 3572(d)(1) and 42 U.S.C. § 1651, to the Clerk of United States District Court, to be applied to his outstanding criminal assessment.

A proposed Order is filed herewith for the Court's convenience.

Respectfully submitted,
UNITED STATES OF AMERICA
By its attorneys

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Christopher R. Donato
CHRISTOPHER R. DONATO
Assistant U.S. Attorney
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Dated: December 22, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served by first-class mail to the defendant's attorney, Barry Wilson, located at 240 Commercial Street, Boston, MA 02109.

/s/ Christopher R. Donato
Christopher R. Donato
Assistant U.S. Attorney

¹ The Standard Conditions of Supervision stipulate that "the defendant shall support his or her dependants and meet other family responsibilities." The defendant owes child support.